

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re:

City of Detroit, Michigan,  
Debtor.

Bankruptcy Case No. 13-53846

Judge Thomas J. Tucker

Chapter 9

***EX PARTE* MOTION OF THE CITY OF DETROIT  
FOR ENTRY OF AN ORDER AUTHORIZING A  
BRIEF IN EXCESS OF THE PAGE LIMIT**

The City of Detroit (“City”), by its undersigned counsel, Miller, Canfield, Paddock and Stone, P.L.C., files this *ex parte* motion for entry of an order authorizing the City to file a 35-page brief in support of its *Motion to Enforce Plan of Adjustment and Require 30-Year Amortization of the UAAL in the Police and Fire Retirement System Pension Plan*, and states as follows:

1. The City of Detroit Police and Fire Retirement System (“PFRS”) recently adopted (over the City’s objections) a resolution providing that the plan’s unfunded actuarial accrued liability (“UAAL”) for retirement benefits, existing as of June 30, 2023, be amortized over 20 years. The Plan of Adjustment (“POA”) and the order confirming it (“Confirmation Order”) provide that the proper period is 30 years. A 20-year amortization will require the City to pay additional hundreds of millions of dollars in front-loaded funding over the amounts that would be due under 30-year amortization (and under the original projections in the POA).

2. The City has prepared a motion and brief to enforce the POA and the Confirmation Order, which it is prepared to file with this Court. However, the length of the City's brief exceeds the 25-page limit provided by Local Bankruptcy Rule 9014-1(f).

3. In view of the complexity and the importance of the issues address by the City's brief, the City requests the length of the brief be extended to thirty-five (35) pages.

WHEREFORE the City respectfully request that the Court enter an order, substantially in the form attached as **Exhibit 1**, granting the City an enlargement of the page limit from 25 to 35 pages for its brief.

Dated: August 2, 2022

MILLER, CANFIELD, PADDOCK AND  
STONE, P.L.C.

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*Attorneys for the City of Detroit*

## **SUMMARY OF ATTACHMENTS**

The following documents are attached to this Motion, labeled in accordance with E.D. Mich. LBR 9014-1(c).

Exhibit 1 Proposed Form of Order

Exhibit 2 None [Motion Seeks Ex Parte Relief]

Exhibit 3 None [Brief Not Required]

Exhibit 4 Certificate of Service

Exhibit 5 None

Exhibit 6 None

**EXHIBIT 1 – PROPOSED ORDER**

**UNITED STATES BANKRUPTCY COURT  
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**EX PARTE ORDER AUTHORIZING THE CITY OF DETROIT  
TO FILE A BRIEF IN EXCESS OF THE PAGE LIMIT**

This matter coming before the Court on the *Ex Parte Motion of the City of Detroit for Entry of an Order Authorizing a Brief in Excess of the Page Limit*, and the Court finding good cause for the entry of this Order; and the Court being fully advised in the premises;

**THE COURT ORDERS THAT** the page limit on the *Brief in Support of the City of Detroit's Motion to Enforce Plan of Adjustment and Require 30-Year Amortization of the UAAL in the Police and Fire Retirement System Pension Plan* is increased from 25 pages to 35 pages.

**EXHIBIT 2 – NONE**

**EXHIBIT 3 – NONE**

**EXHIBIT 4 – CERTIFICATE OF SERVICE**

**UNITED STATES BANKRUPTCY COURT  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on August 2, 2022, he served a copy of the foregoing *Ex Parte Motion of the City of Detroit for Entry of an Order Authorizing a Brief in Excess of the Page Limit* with the Clerk of the Court via the Court's ECF electronic filing system which will provide notice of the filing to all registered participants in this matter.

Dated: August 2, 2022

MILLER, CANFIELD, PADDOCK AND  
STONE, P.L.C.

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**EXHIBIT 5 – NONE**



**EXHIBIT 6 - NONE**